



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



September 30, 2015

Mr. Patrick McKenzie
Pacific Ethanol Stockton LLC
3028 Navy Drive
Stockton, CA 95206

**Re: Notice of Minor Title V Permit Modification
District Facility # N-7365
Project # N-1152919**

Dear Mr. McKenzie:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct permits N-7365-4-4 and '-19-4 (under project N-1143242 and N-1142776) into the Title V operating permit. These permits authorized installation of a slurry-mix tank and change to the VOC monitoring frequency from monthly to daily for the vapor recovery system.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct permits N-7365-4-4 and '-19-4, emission increases, applications, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

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Executive Director/Air Pollution Control Officer

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Title V APPLICATION REVIEW Minor Modification

Facility Number: N-7365
Facility Name: Pacific Ethanol Stockton, LLC
Mailing Address: 3028 Navy Drive
Stockton, CA 95206

Contact Name: Mike Kandris
Phone: (916) 403-2124

Responsible Official: Mike Kandris
Title: Chief Operating Officer

Processing Staff: Jag Kahlon
Project Number: N-1152919
Date: September 30, 2015

I. PROPOSAL

Pacific Ethanol Stockton, LLC has proposed to incorporate Authority to Construct (ATC) permit N-7365-4-4 (issued under ATC project N-1143242) and N-7365-19-4 (issued under ATC project N-1142776) into their Title V operating permit. These permits were issued without Certificate of Conformity (COC). These permits authorized installation of a slurry-mix tank and change to the VOC monitoring frequency from monthly to daily for the vapor recovery system.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for permit requirements.

II. FACILITY LOCATION

This facility is located at 3028 Navy Drive, Stockton, California.

III. EQUIPMENT DESCRIPTION

N-7365-4-6

ONE 18,500 GALLON SLURRY TANK AND ONE 78,050 GALLON SLURRY MIX TANK SERVED BY A KOTCH GLICH VENT GAS SCRUBBER (SCRUBBER SHARED WITH PERMITS N-7365-5, '-6, '-9, '-10 AND '-11) WHICH IS VENTED TO A 2.4 MMBTU/HR A.H. LUNDBERG ASSOCIATES, INC. REGENERATIVE THERMAL OXIDIZER WITH A MAXON MODEL KINEDIZER LE LOW NOX BURNER (RTO SHARED WITH PERMITS N-7365-5, '-6, '-7, '-8, '-9, -10 AND '-11)

N-7365-19-6

DENATURED ETHANOL BOTTOM TRUCK LOADING RACK WITH DRY BREAK COUPLERS SERVED BY A JOHN ZINK MODEL S3-AAD-1-70-90-6 HYDROCARBON VAPOR RECOVERY UNIT (VRU)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This project is a Minor Modification under Rule 2520 since the proposed modifications were not SB-288 or Federal major modifications under Rule 2201. Therefore, public review is not required for this project.

V. APPLICABLE REQUIREMENTS

Rule 2520 Federally Mandated Operating Permits (6/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The following section details the changes made to the permit conditions:

N-7365-4:

Equipment description in PTO N-7365-4-3

ONE 18,500 GALLON SLURRY TANK SERVED BY A KOTCH GLICH VENT GAS SCRUBBER (SCRUBBER SHARED WITH PERMITS N-7365-5, '-6, '-9, '-10 AND '-11) WHICH IS VENTED TO A 2.4 MMBTU/HR A.H. LUNDBERG ASSOCIATES, INC. REGENERATIVE THERMAL OXIDIZER WITH A MAXON MODEL KINEDIZER LE LOW NOX BURNER (RTO SHARED WITH PERMITS N-7365-5, '-6, '-7, '-8, '-9, -10 AND '-11)

The equipment description is revised to indicate that there will be an additional slurry tank. The equipment description is now being stated in the following manner.

ONE 18,500 GALLON SLURRY TANK AND ONE 78,050 GALLON SLURRY MIX TANK BOTH SERVED BY A KOTCH GLICH VENT GAS SCRUBBER (SCRUBBER SHARED WITH PERMITS N-7365-5, '-6, '-9, '-10 AND '-11) WHICH IS VENTED TO A 2.4 MMBTU/HR A.H. LUNDBERG ASSOCIATES, INC. REGENERATIVE THERMAL OXIDIZER WITH A MAXON MODEL KINEDIZER LE LOW NOX BURNER (RTO SHARED WITH PERMITS N-7365-5, '-6, '-7, '-8, '-9, -10 AND '-11)

Condition #10 in PTO N-7365-4-3

- There shall be no fugitive VOC emissions from equipment leaks associated with this slurry tank. [District Rules 2201 and 4455]

During ATC project N-1143242, the above condition is replaced with the following conditions.

- The VOC content of the vapor in the slurry tank and slurry mix tank shall not exceed 10% by weight. [District Rules 2201 and 4455]
- Operator shall conduct initial sampling from the slurry mix tank to qualify for exemption from fugitive component counts for components handling fluids with less than 10% VOC by weight. [District Rule 2201]
- VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]

VOC content of the solution in the slurry mix tank is required to be determined to ensure that fluid handled in the new tank contains less than 10% VOC by weight. Per guidance in District policy (SSP-2015, 9/15/05), VOC emissions are not assessed from piping and components for such process stream (i.e., corn slurry mix tank) provided that the stream contains 10% or less VOC by weight. All the above conditions are now federally enforceable through Title V permit.

N-7365-19:

Condition #15 and 16 in PTO N-7365-19-3

- Ongoing compliance with VOC emission rate from the exhaust vent of the VRU shall be demonstrated at least once per month by sampling the effluent gas stream with an FID, PID, or other District-approved VOC detection device. [District Rule 2201]
- Within 6 months of the Title V permit being issued, permittee shall apply for an Authority to Construct (ATC) and fully implement one of the following: 1) modify post-control VOC sampling rate to at least once per day or 2) install a continuous VOC emissions monitor. [40 CFR Part 64]

The facility has chosen to monitor VOC emissions discharge rate from the vapor recovery unit on a daily basis using a portable handheld VOC monitor to comply with 40 CFR Part 64. The above conditions are replaced with the following conditions:

- Ongoing compliance with VOC emission rate from the exhaust vent of the VRU shall be demonstrated at least once per day by sampling the effluent gas stream with an FID, PID, or other District-approved VOC detection device. The VOC detection device shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations. [District Rule 2201 and 40 CFR Part 64]
- The permittee shall maintain records of: (1) the daily compliance demonstrations taken with a FID, PID, or other District-approved VOC detection device, (2) make and model of the VOC detection device, and (3) calibration records of the VOC detection device. [District Rules 1070 and 2201, 40 CFR Part 64]

Note that these conditions are now federally enforceable through Title V permit.

Condition #20 in PTO N-7365-19-3

- Source testing to demonstrate compliance with the overall VOC emissions rate from the exhaust of the VRU shall be conducted within 60 days after recommencing the operation and at least once every twelve (12) months thereafter, with equipment in operational condition. Source testing shall be conducted while denatured ethanol is being processed through the loading rack. [District Rule 2201]

The facility had resumed its ethanol production operation in December 1, 2010¹, and conducted source testing on January 11, 2011. The source testing was completed within 60 days of recommencing the operation. Therefore, this condition was amended and stated in the following manner:

- Source testing to demonstrate compliance with the overall VOC emissions rate from the exhaust of the VRU shall be conducted at least once every 12 months, with equipment in operational condition. Source testing shall be conducted while denatured ethanol is being processed through the loading rack. [District Rule 2201]

This condition is now federally enforceable through Title V permit.

Condition #21 in PTO N-7365-19-3

- Source testing to demonstrate compliance with the 99% control efficiency of the VRU shall be conducted within 60 days after recommencing the

¹Per correspondence under project N1103780, PES appears to have recommenced its operation in December 2010.

operation, with equipment in operational condition. Source testing shall be conducted while denatured ethanol is being processed through the loading rack. [District Rule 2201]

PES had resumed its ethanol production operation in December 1, 2010, and conducted source testing on January 11, 2011. The source testing was completed within 60 days of recommencing the operation. Note that the VOC control efficiency test was a one-time test per source testing discussion in project N-1082713. Therefore, this condition has been removed from the permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act;
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including:

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix III).

Compliance is expected with this Rule.

APPENDICES

Appendix I:	Proposed Title V Operating Permit No. N-7365-4-6 and '-19-6
Appendix II:	Authority to Construct Permits N-7365-4-4 and '-19-4
Appendix III:	Permit Applications
Appendix IV:	Emissions Change
Appendix V:	Previous Permits to Operate N-7365-4-3 and '-19-3

Appendix I
Proposed Title V Operating Permit No. N-7365-4-6 and '-19-6

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-7365-4-6

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

ONE 18,500 GALLON SLURRY TANK AND ONE 78,050 GALLON SLURRY MIX TANK BOTH SERVED BY A KOTCH GLICH VENT GAS SCRUBBER (SCRUBBER SHARED WITH PERMITS N-7365-5, '-6, '-9, '-10 AND '-11) WHICH IS VENTED TO A 2.4 MMBTU/HR A.H. LUNDBERG ASSOCIATES, INC. REGENERATIVE THERMAL OXIDIZER WITH A MAXON MODEL KINEDIZER LE LOW NOX BURNER (RTO SHARED WITH PERMITS N-7365-5, '-6, '-7, '-8, '-9, '-10 AND '-11)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The maximum amount of ethanol produced at this facility shall not exceed either of the following limits: 360,000 gallon/day or 60,000,000 gallon/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All vapors from the slurry tank shall be vented through the vent gas scrubber and then through the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The RTO shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The overall control efficiency for the vent gas scrubber vented to the RTO shall be a minimum of 99.5% for VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Controlled VOC emissions rate from the slurry tank served by the vent gas scrubber vented to the RTO shall not exceed 0.01161 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Controlled VOC emissions rate from the slurry tank, yeast tank, liquefaction tank, distillation process, process condensate tank and wet cake process all served by the vent gas scrubber vented to the RTO shall not exceed 0.01161 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Controlled VOC emissions rate from the exhaust of the RTO while serving the slurry tank, yeast tank, liquefaction tank, fermentation process, beerwell process tank, distillation process, process condensate tank and wet cake process shall not exceed 0.07421 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions rates from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.05 lb-NO_x/MMBtu; 0.084 lb-CO/MMBtu; 0.0055 lb-MMBtu; 0.0076 lb-PM₁₀/MMBtu; or 0.00285 lb-SO_x/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC content of the vapor in the slurry tank and slurry mix tank shall not exceed 10% by weight. [District Rules 2201 and 4455] Federally Enforceable Through Title V Permit
11. Operator shall conduct initial sampling from the slurry mix tank to qualify for exemption from fugitive component counts for components handling fluids with less than 10% VOC by weight. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
14. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
15. Except as otherwise provided in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
16. The permittee shall maintain daily and annual records, in gallons, of the quantity of ethanol produced at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. Source testing to demonstrate compliance with the 99.5% overall control efficiency of the CO2 scrubber vented to the RTO and the vent gas scrubber vented to the RTO shall be conducted at least once every twelve (12) months with equipment in operational condition. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Source testing to demonstrate compliance with the overall VOC emissions rate from the exhaust of the RTO shall be conducted within 120 days after initial start-up and at least once every twelve (12) months thereafter, with equipment in operational condition. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Compliance with the 99.5% overall VOC control efficiency shall be determined as follows: Overall VOC Control Efficiency (%) = $\{[(\text{CO}_2 \text{ Scrubber Inlet} + \text{Vent Gas Scrubber Inlet}) - \text{RTO Outlet}] / [\text{CO}_2 \text{ Scrubber Inlet} + \text{Vent Gas Scrubber Inlet}]\} \times 100\%$. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. Source testing for VOC emissions shall be conducted using EPA Method 18, 25 or 25A. Source testing shall also be conducted in accordance with EPA's Midwest Scaling Protocol for the Measurement of "VOC Mass Emissions" at Ethanol Production Facilities and/or any other testing methodology that has been previously approved by the District, CARB, and EPA. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
22. During source testing, permittee shall maintain record of ethanol production rate measured in gal-ethanol/hour. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The vent gas scrubber shall be equipped with a water flow meter, in operation at all times. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
25. The water flow rate through the vent gas scrubber shall not be less than 25 gal/minute. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. The permittee shall monitor and record the water flow rate through the vent gas scrubber at least once every day. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

27. If the water flow rate through the vent gas scrubber is less than 25 gal/minute, the permittee shall correct the water flow rate to exceed 25 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate through the vent gas scrubber continues to be less than 25 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
28. The permittee shall maintain records of (1) the date of water flow rate measurements, (2) the water flow rate through the vent gas scrubber at the time of measure, and (3) a description of any corrective action taken to maintain the water flow rate above the 25 gal/minute limit. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
29. The RTO shall be operated at a temperature of no less than 1,400 °F. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
30. The RTO shall be equipped with a continuous temperature monitoring and recording device, in operation at all times. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
31. Upon detecting any excursion from the acceptable temperature readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
32. The permittee shall comply with the compliance assurance monitoring and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. The permittee shall maintain daily records of (1) the date of RTO temperature measurements, (2) the temperature of the RTO at the time of measure, and (3) a description of any corrective action taken to maintain the temperature above the 1,400 °F limit. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
34. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
35. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
36. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-7365-19-6

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

DENATURED ETHANOL BOTTOM TRUCK LOADING RACK WITH DRY BREAK COUPLERS SERVED BY A JOHN ZINK MODEL S3-AAD-1-70-90-6 HYDROCARBON VAPOR RECOVERY UNIT (VRU)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Vapor return hose(s) shall be attached whenever loading equipment operates. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All trucks loaded shall be inspected and determined to be vapor-tight such that all vapors are displaced into vapor return hoses during loading. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All vapors displaced from trucks during load-out operations shall be routed through the hydrocarbon vapor recovery unit (VRU). [District Rule 2201] Federally Enforceable Through Title V Permit
6. The hydrocarbon vapor recovery unit shall maintain a minimum control efficiency of 99% for VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The VRU shall consist of two adsorption columns filled with activated carbon for VOC emission control and a dry vacuum pump and packed absorption column for activated carbon regeneration. One activated carbon column shall be on-stream receiving vapors in the adsorption mode while the other activated carbon column is off-stream in the regeneration mode. Each activated carbon column shall be regenerated at a frequency recommended by the manufacturer (typically ranging between 10 - 20 minutes). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum amount of denatured ethanol loaded into trucks or railcars shall not exceed either of the following limits: 720,000 gallons/day or 93,000,000 gallons/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Controlled VOC emissions rate from the vapor recovery system serving the denatured ethanol loading rack shall not exceed 0.0834 lb/1,000 gal-denatured ethanol loaded (equivalent to 10 milligrams of VOC / liter of ethanol loaded). This VOC emission rate is based on a six hour rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The maximum number of gasoline hose disconnects performed by the ethanol truck loading operation shall not exceed either of the following limits: 200 disconnects/day or 73,000 disconnects/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The maximum liquid spillage/leaks from each hose disconnect shall not exceed 10 milliliters. [District Rule 2201] Federally Enforceable Through Title V Permit
12. VOC emissions from the denatured ethanol truck loading operation shall not exceed 3.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Fugitive VOC emissions from equipment leaks associated with the denatured ethanol truck loading operation shall not exceed 3.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Fugitive VOC emissions shall be calculated using the EPA "1995 Protocol for equipment Leak Emissions Estimates" (EPA-453/R-95-017), Table 2-1, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Average Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Ongoing compliance with VOC emission rate from the exhaust vent of the VRU shall be demonstrated at least once per day by sampling the effluent gas stream with an FID, PID, or other District-approved VOC detection device. The VOC detection device shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
16. The permittee shall maintain daily and annual records, in gallons, of the quantity of denatured ethanol processed through the loading rack. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. The permittee shall maintain daily and annual records of the quantity of ethanol hose disconnects at the ethanol truck loading operation. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of: (1) the daily compliance demonstrations taken with a FID, PID, or other District-approved VOC detection device, (2) make and model of the VOC detection device, and (3) calibration records of the VOC detection device. [District Rules 1070 and 2201, 40 CFR Part 64] Federally Enforceable Through Title V Permit
19. Source testing to demonstrate compliance with the overall VOC emissions rate from the exhaust of the VRU shall be conducted at least once every 12 months, with equipment in operational condition. Source testing shall be conducted while denatured ethanol is being processed through the loading rack. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. Source testing for VOC emissions shall be conducted using EPA Method 18, 25 or 25A. If applicable, source testing shall also be conducted in accordance with EPA's Midwest Scaling Protocol for the Measurement of "VOC Mass Emissions" at Ethanol Production Facilities and/or any other testing methodology that has been previously approved by the District, CARB, and EPA. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. During source testing, permittee shall maintain records of the amount of the ethanol loaded, measured in gal-ethanol/hour. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. Valves, threaded connections, and flanges shall not leak VOCs in excess of 100 ppmv above background when measured in accordance with EPA Method 21, provided the total number of leaking tagged components of any component type does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
25. Pressure relief valves (PRVs) shall not leak VOC's in excess of 100 ppmv above background when measured in the plane at the centroid of any atmospheric vent with an instrument calibrated with methane, provided the total number of leaking PRVs does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
26. Process drains shall not leak VOC's in excess of 100 ppmv above background when measured at a distance of one (1) centimeter of the potential source with an instrument calibrated with methane, provided the total number of leaking process drains does not exceed 0.5 percent of the total number of components inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

27. Pumps or compressors which handle a VOC or any associated seal fluid system which circulates a fluid through or between seals on process pumps or compressors shall not leak in excess of 500 ppmv above background when measured in accordance with EPA Method 21. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
28. This operation shall comply with the requirements of District Rule 4455, Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants, as specified on facility wide permit N-7365-0. [District Rule 4455] Federally Enforceable Through Title V Permit
29. This operation shall comply with the requirements of 40 CFR 60, Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, as specified on facility wide permit N-7365-0. [40 CFR 60.480 and 60.481] Federally Enforceable Through Title V Permit
30. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
31. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
32. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix II
Authority to Construct Permits N-7365-4-4 and '-19-4



AUTHORITY TO CONSTRUCT

PERMIT NO: N-7365-4-4

ISSUANCE DATE: 11/13/2014

LEGAL OWNER OR OPERATOR: PACIFIC ETHANOL STOCKTON LLC
MAILING ADDRESS: 400 CAPITOL MALL, STE 2060
SACRAMENTO, CA 95814

LOCATION: 3028 NAVY DRIVE
STOCKTON, CA 95206

EQUIPMENT DESCRIPTION:

MODIFICATION OF ONE 18,500 GALLON SLURRY TANK SERVED BY A KOTCH GLICH VENT GAS SCRUBBER (SCRUBBER SHARED WITH PERMITS N-7365-5, '-6, '-9, '-10 AND '-11) WHICH IS VENTED TO A 2.4 MMBTU/HR A.H. LUNDBERG ASSOCIATES, INC. REGENERATIVE THERMAL OXIDIZER WITH A MAXON MODEL KINEDIZER LE LOW NOX BURNER (RTO SHARED WITH PERMITS N-7365-5, '-6, '-7, '-8, '-9, '-10 AND '-11): ADD ONE 78,050 GALLON SLURRY MIX TANK CONNECTED TO THE VENT GAS SCRUBBER

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The maximum amount of ethanol produced at this facility shall not exceed either of the following limits: 360,000 gallon/day or 60,000,000 gallon/year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All vapors from the slurry tank shall be vented through the vent gas scrubber and then through the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The RTO shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The overall control efficiency for the vent gas scrubber vented to the RTO shall be a minimum of 99.5% for VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services

N-7365-4-4 Nov 13 2014 2:59PM - TQMS Joint Inspection NOT Required

7. Controlled VOC emissions rate from the slurry tank served by the vent gas scrubber vented to the RTO shall not exceed 0.01161 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Controlled VOC emissions rate from the slurry tank, yeast tank, liquefaction tank, distillation process, process condensate tank and wet cake process all served by the vent gas scrubber vented to the RTO shall not exceed 0.01161 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Controlled VOC emissions rate from the exhaust of the RTO while serving the slurry tank, yeast tank, liquefaction tank, fermentation process, beerwell process tank, distillation process, process condensate tank and wet cake process shall not exceed 0.07421 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions rates from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.05 lb-NO_x/MMBtu; 0.084 lb-CO/MMBtu; 0.0055 lb-MMBtu; 0.0076 lb-PM₁₀/MMBtu; or 0.00285 lb-SO_x/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC content of the vapor in the slurry tank and slurry mix tank shall not exceed 10% by weight. [District Rules 2201 and 4455]
12. Operator shall conduct initial sampling from the slurry mix tank to qualify for exemption from fugitive component counts for components handling fluids with less than 10% VOC by weight. [District Rule 2201]
13. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
14. Tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
15. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
16. Except as otherwise provided in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
17. The permittee shall maintain daily and annual records, in gallons, of the quantity of ethanol produced at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. Source testing to demonstrate compliance with the 99.5% overall control efficiency of the CO₂ scrubber vented to the RTO and the vent gas scrubber vented to the RTO shall be conducted at least once every twelve (12) months with equipment in operational condition. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Source testing to demonstrate compliance with the overall VOC emissions rate from the exhaust of the RTO shall be conducted within 120 days after initial start-up and at least once every twelve (12) months thereafter, with equipment in operational condition. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Compliance with the 99.5% overall VOC control efficiency shall be determined as follows: Overall VOC Control Efficiency (%) = $\{[(\text{CO}_2 \text{ Scrubber Inlet} + \text{Vent Gas Scrubber Inlet}) - \text{RTO Outlet}] / [\text{CO}_2 \text{ Scrubber Inlet} + \text{Vent Gas Scrubber Inlet}]\} \times 100\%$. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing for VOC emissions shall be conducted using EPA Method 18, 25 or 25A. Source testing shall also be conducted in accordance with EPA's Midwest Scaling Protocol for the Measurement of "VOC Mass Emissions" at Ethanol Production Facilities and/or any other testing methodology that has been previously approved by the District, CARB, and EPA. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

23. During source testing, permittee shall maintain record of ethanol production rate measured in gal-ethanol/hour. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The vent gas scrubber shall be equipped with a water flow meter, in operation at all times. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. The water flow rate through the vent gas scrubber shall not be less than 25 gal/minute. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. The permittee shall monitor and record the water flow rate through the vent gas scrubber at least once every day. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
28. If the water flow rate through the vent gas scrubber is less than 25 gal/minute, the permittee shall correct the water flow rate to exceed 25 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate through the vent gas scrubber continues to be less than 25 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of (1) the date of water flow rate measurements, (2) the water flow rate through the vent gas scrubber at the time of measure, and (3) a description of any corrective action taken to maintain the water flow rate above the 25 gal/minute limit. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
30. The RTO shall be operated at a temperature of no less than 1,400 °F. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
31. The RTO shall be equipped with a continuous temperature monitoring and recording device, in operation at all times. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
32. Upon detecting any excursion from the acceptable temperature readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. The permittee shall comply with the compliance assurance monitoring and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
34. The permittee shall maintain daily records of (1) the date of RTO temperature measurements, (2) the temperature of the RTO at the time of measure, and (3) a description of any corrective action taken to maintain the temperature above the 1,400 °F limit. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
35. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
36. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT


HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-7365-19-4

ISSUANCE DATE: 08/25/2014

LEGAL OWNER OR OPERATOR: PACIFIC ETHANOL STOCKTON LLC
MAILING ADDRESS: 400 CAPITOL MALL, STE 2060
SACRAMENTO, CA 95814

LOCATION: 3028 NAVY DRIVE
STOCKTON, CA 95206

EQUIPMENT DESCRIPTION:

MODIFICATION OF DENATURED ETHANOL BOTTOM TRUCK LOADING RACK WITH DRY BREAK COUPLERS SERVED BY A JOHN ZINK MODEL S3-AAD-1-70-90-6 HYDROCARBON VAPOR RECOVERY UNIT (VRU): CHANGE VOC MONITORING FREQUENCY FROM "MONTHLY" TO "DAILY" FOR THE VRU SYSTEM

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Vapor return hose(s) shall be attached whenever loading equipment operates. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All trucks loaded shall be inspected and determined to be vapor-tight such that all vapors are displaced into vapor return hoses during loading. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All vapors displaced from trucks during load-out operations shall be routed through the hydrocarbon vapor recovery unit (VRU). [District Rule 2201] Federally Enforceable Through Title V Permit
7. The hydrocarbon vapor recovery unit shall maintain a minimum control efficiency of 99% for VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services

N-7365-19-4: Aug 25 2014 9:44AM - KAVLONJ : Joint Inspection NOT Required

8. The VRU shall consist of two adsorption columns filled with activated carbon for VOC emission control and a dry vacuum pump and packed absorption column for activated carbon regeneration. One activated carbon column shall be on-stream receiving vapors in the adsorption mode while the other activated carbon column is off-stream in the regeneration mode. Each activated carbon column shall be regenerated at a frequency recommended by the manufacturer (typically ranging between 10 - 20 minutes). [District Rule 2201] Federally Enforceable Through Title V Permit
9. The maximum amount of denatured ethanol loaded into trucks or railcars shall not exceed either of the following limits: 720,000 gallons/day or 93,000,000 gallons/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Controlled VOC emissions rate from the vapor recovery system serving the denatured ethanol loading rack shall not exceed 0.0834 lb/1,000 gal-denatured ethanol loaded (equivalent to 10 milligrams of VOC / liter of ethanol loaded). This VOC emission rate is based on a six hour rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The maximum number of gasoline hose disconnects performed by the ethanol truck loading operation shall not exceed either of the following limits: 200 disconnects/day or 73,000 disconnects/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The maximum liquid spillage/leaks from each hose disconnect shall not exceed 10 milliliters. [District Rule 2201] Federally Enforceable Through Title V Permit
13. VOC emissions from the denatured ethanol truck loading operation shall not exceed 3.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Fugitive VOC emissions from equipment leaks associated with the denatured ethanol truck loading operation shall not exceed 3.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Fugitive VOC emissions shall be calculated using the EPA "1995 Protocol for equipment Leak Emissions Estimates" (EPA-453/R-95-017), Table 2-1, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Average Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Ongoing compliance with VOC emission rate from the exhaust vent of the VRU shall be demonstrated at least once per day by sampling the effluent gas stream with an FID, PID, or other District-approved VOC detection device. The VOC detection device shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations. [District Rule 2201 and 40 CFR Part 64]
17. The permittee shall maintain daily and annual records, in gallons, of the quantity of denatured ethanol processed through the loading rack. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. The permittee shall maintain daily and annual records of the quantity of ethanol hose disconnects at the ethanol truck loading operation. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of: (1) the daily compliance demonstrations taken with a FID, PID, or other District-approved VOC detection device, (2) make and model of the VOC detection device, and (3) calibration records of the VOC detection device. [District Rules 1070 and 2201, 40 CFR Part 64]
20. Source testing to demonstrate compliance with the overall VOC emissions rate from the exhaust of the VRU shall be conducted at least once every 12 months, with equipment in operational condition. Source testing shall be conducted while denatured ethanol is being processed through the loading rack. [District Rule 2201]
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing for VOC emissions shall be conducted using EPA Method 18, 25 or 25A. If applicable, source testing shall also be conducted in accordance with EPA's Midwest Scaling Protocol for the Measurement of "VOC Mass Emissions" at Ethanol Production Facilities and/or any other testing methodology that has been previously approved by the District, CARB, and EPA. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. During source testing, permittee shall maintain records of the amount of the ethanol loaded, measured in gal-ethanol/hour. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
25. Valves, threaded connections, and flanges shall not leak VOCs in excess of 100 ppmv above background when measured in accordance with EPA Method 21, provided the total number of leaking tagged components of any component type does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
26. Pressure relief valves (PRVs) shall not leak VOC's in excess of 100 ppmv above background when measured in the plane at the centroid of any atmospheric vent with an instrument calibrated with methane, provided the total number of leaking PRVs does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
27. Process drains shall not leak VOC's in excess of 100 ppmv above background when measured at a distance of one (1) centimeter of the potential source with an instrument calibrated with methane, provided the total number of leaking process drains does not exceed 0.5 percent of the total number of components inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
28. Pumps or compressors which handle a VOC or any associated seal fluid system which circulates a fluid through or between seals on process pumps or compressors shall not leak in excess of 500 ppmv above background when measured in accordance with EPA Method 21. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
29. This operation shall comply with the requirements of District Rule 4455, Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants, as specified on facility wide permit N-7365-0. [District Rule 4455] Federally Enforceable Through Title V Permit
30. This operation shall comply with the requirements of 40 CFR 60, Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, as specified on facility wide permit N-7365-0. [40 CFR 60.480 and 60.481] Federally Enforceable Through Title V Permit
31. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
32. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
33. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit

Appendix III Permit Application

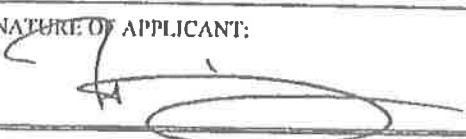


San Joaquin Valley Air Pollution Control District
www.valleyair.org



Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>PACIFIC ETHANOL STOCKTON</u>	
2. MAILING ADDRESS: STREET/P.O. BOX <u>SUITE 2060 400 CAPITAL MALL WAY</u> CITY: <u>SACRAMENTO</u> STATE: <u>CA.</u> 9-DIGIT ZIP CODE <u>95218</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>3208 NAVY DR.</u> CITY: <u>STOCKTON</u> 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <u>TBD</u> <u>Nov./DEC 2015</u>
4. GENERAL NATURE OF BUSINESS: <u>ETHANOL PRODUCTION</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>ATC N-7365-A-4</u> <u>ADDITION OF ONE 78,050 GALLON SLURRY MIX TANK</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>PATRICK MCKENZIE</u>	TITLE OF APPLICANT: <u>DIRECTOR OF CORP. ENGINEERING</u>
7. SIGNATURE OF APPLICANT: 	DATE: _____ PHONE: <u>(209) 487-2836</u> FAX: <u>()</u> EMAIL: _____

For APCD Use Only:

DATE STAMP RECEIVED <u>AUG 27 2015</u> SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>N1152919</u> FACILITY ID: <u>N-7365</u>
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San Joaquin Valley
Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box) ATC-N-7365-4-4

☐ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION

☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME: <u>PACIFIC ETHANOL STOCKTON</u>	FACILITY ID: <u>-</u>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>PACIFIC ETHANOL STOCKTON</u>	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Signature of Responsible Official

AUG. 27/2015
Date

PATRICK MCKENZIE
Name of Responsible Official (please print)

DIRECTOR OF CORPORATE ENGINEER
Title of Responsible Official (please print)



San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

[] ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>PACIFIC ETHANOL STOCKTON</u>		
2. MAILING ADDRESS: STREET/P.O. BOX. <u>SUITE 2060 400 CAPITAL MALL WAY</u> CITY: <u>SACRAMENTO</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95218</u>		
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>3208 NAVY DR.</u> CITY: <u>STOCKTON</u> _____% SECTION _____ TOWNSHIP _____ RANGE _____		INSTALLATION DATE: <u>TBD</u> <u>NOV/DEC 2015</u>
4. GENERAL NATURE OF BUSINESS: <u>ETHANOL PRODUCTION</u>		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>ATC-N-7365-19-A : CHANGE VOC MONITORING</u> <u>FREQUENCY FROM MONTHLY TO DAILY FOR THE</u> <u>VRU UNIT/SYSTEM.</u>		
6. TYPE OR PRINT NAME OF APPLICANT: <u>PATRICK MCKENZIE</u>		TITLE OF APPLICANT: <u>DIRECTOR of CORPORATE ENG.</u>
7. SIGNATURE OF APPLICANT: <u>[Signature]</u> DATE: _____		PHONE: <u>(209) 487-2836</u> FAX: <u>()</u> EMAIL: <u>p.mckenzie@pacificethanol.com</u>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: _____ FACILITY ID: _____

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San Joaquin Valley
Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box) ATC - N - 7365-19-4

☐ SIGNIFICANT PERMIT MODIFICATION

☐ ADMINISTRATIVE
AMENDMENT

☒ MINOR PERMIT MODIFICATION

COMPANY NAME: <u>PACIFIC ETHANOL STOCKTON</u>	FACILITY ID: <u>-</u>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>PACIFIC ETHANOL STOCKTON</u>	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

Aug. 27/2015
Date

PATRICK MCKENZIE
Name of Responsible Official (please print)

DIRECTOR OF CORPORATE ENGINEERING
Title of Responsible Official (please print)

Appendix IV Emissions Change

Emissions Change

N-7365-4-4:

Per project N-1143242, quarterly emissions change is zero for each pollutant.

N-7365-19-4:

Per project N-1142776, quarterly emissions change is zero for each pollutant.

Appendix V
Previous Permits to Operate N-7365-4-3 and '-19-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-7365-4-3

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

ONE 18,500 GALLON SLURRY TANK SERVED BY A KOTCH GLICH VENT GAS SCRUBBER (SCRUBBER SHARED WITH PERMITS N-7365-5, '-6, '-9, '-10 AND '-11) WHICH IS VENTED TO A 2.4 MMBTU/HR A.H. LUNDBERG ASSOCIATES, INC. REGENERATIVE THERMAL OXIDIZER WITH A MAXON MODEL KINEDIZER LE LOW NOX BURNER (RTO SHARED WITH PERMITS N-7365-5, '-6, '-7, '-8, '-9, '-10 AND '-11)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The maximum amount of ethanol produced at this facility shall not exceed either of the following limits: 360,000 gallon/day or 60,000,000 gallon/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All vapors from the slurry tank shall be vented through the vent gas scrubber and then through the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The RTO shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The overall control efficiency for the vent gas scrubber vented to the RTO shall be a minimum of 99.5% for VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Controlled VOC emissions rate from the slurry tank served by the vent gas scrubber vented to the RTO shall not exceed 0.01161 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Controlled VOC emissions rate from the slurry tank, yeast tank, liquefaction tank, distillation process, process condensate tank and wet cake process all served by the vent gas scrubber vented to the RTO shall not exceed 0.01161 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Controlled VOC emissions rate from the exhaust of the RTO while serving the slurry tank, yeast tank, liquefaction tank, fermentation process, beerwell process tank, distillation process, process condensate tank and wet cake process shall not exceed 0.07421 lb/1,000 gal-ethanol produced at the facility. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions rates from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.05 lb-NO_x/MMBtu; 0.084 lb-CO/MMBtu; 0.0055 lb-MMBtu; 0.0076 lb-PM₁₀/MMBtu; or 0.00285 lb-SO_x/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. There shall be no fugitive VOC emissions from equipment leaks associated with this slurry tank. [District Rules 2201 and 4455] Federally Enforceable Through Title V Permit
11. Tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Except as otherwise provided in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The permittee shall maintain daily and annual records, in gallons, of the quantity of ethanol produced at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. Source testing to demonstrate compliance with the 99.5% overall control efficiency of the CO₂ scrubber vented to the RTO and the vent gas scrubber vented to the RTO shall be conducted at least once every twelve (12) months with equipment in operational condition. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Source testing to demonstrate compliance with the overall VOC emissions rate from the exhaust of the RTO shall be conducted within 120 days after initial start-up and at least once every twelve (12) months thereafter, with equipment in operational condition. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Compliance with the 99.5% overall VOC control efficiency shall be determined as follows: Overall VOC Control Efficiency (%) = $\{[(\text{CO}_2 \text{ Scrubber Inlet} + \text{Vent Gas Scrubber Inlet}) - \text{RTO Outlet}] / [\text{CO}_2 \text{ Scrubber Inlet} + \text{Vent Gas Scrubber Inlet}]\} \times 100\%$. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. Source testing for VOC emissions shall be conducted using EPA Method 18, 25 or 25A. Source testing shall also be conducted in accordance with EPA's Midwest Scaling Protocol for the Measurement of "VOC Mass Emissions" at Ethanol Production Facilities and/or any other testing methodology that has been previously approved by the District, CARB, and EPA. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
20. During source testing, permittee shall maintain record of ethanol production rate measured in gal-ethanol/hour. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The vent gas scrubber shall be equipped with a water flow meter, in operation at all times. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
23. The water flow rate through the vent gas scrubber shall not be less than 25 gal/minute. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the water flow rate through the vent gas scrubber at least once every day. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
25. If the water flow rate through the vent gas scrubber is less than 25 gal/minute, the permittee shall correct the water flow rate to exceed 25 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate through the vent gas scrubber continues to be less than 25 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of (1) the date of water flow rate measurements, (2) the water flow rate through the vent gas scrubber at the time of measure, and (3) a description of any corrective action taken to maintain the water flow rate above the 25 gal/minute limit. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
27. The RTO shall be operated at a temperature of no less than 1,400 °F. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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28. The RTO shall be equipped with a continuous temperature monitoring and recording device, in operation at all times. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
29. Upon detecting any excursion from the acceptable temperature readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
30. The permittee shall comply with the compliance assurance monitoring and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
31. The permittee shall maintain daily records of (1) the date of RTO temperature measurements, (2) the temperature of the RTO at the time of measure, and (3) a description of any corrective action taken to maintain the temperature above the 1,400 °F limit. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
32. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
33. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
34. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-7365-19-3

EXPIRATION DATE: 09/30/2017

EQUIPMENT DESCRIPTION:

DENATURATED ETHANOL BOTTOM TRUCK LOADING RACK WITH DRY BREAK COUPLERS SERVED BY A JOHN ZINK MODEL S3-AAD-1-70-90-6 HYDROCARBON VAPOR RECOVERY UNIT (VRU)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Vapor return hose(s) shall be attached whenever loading equipment operates. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All trucks loaded shall be inspected and determined to be vapor-tight such that all vapors are displaced into vapor return hoses during loading. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All vapors displaced from trucks during load-out operations shall be routed through the hydrocarbon vapor recovery unit (VRU). [District Rule 2201] Federally Enforceable Through Title V Permit
6. The hydrocarbon vapor recovery unit shall maintain a minimum control efficiency of 99% for VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The VRU shall consist of two adsorption columns filled with activated carbon for VOC emission control and a dry vacuum pump and packed absorption column for activated carbon regeneration. One activated carbon column shall be on-stream receiving vapors in the adsorption mode while the other activated carbon column is off-stream in the regeneration mode. Each activated carbon column shall be regenerated at a frequency recommended by the manufacturer (typically ranging between 10 - 20 minutes). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum amount of denaturated ethanol loaded into trucks or railcars shall not exceed either of the following limits: 720,000 gallons/day or 93,000,000 gallons/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Controlled VOC emissions rate from the vapor recovery system serving the denaturated ethanol loading rack shall not exceed 0.0834 lb/1,000 gal-denaturated ethanol loaded (equivalent to 10 milligrams of VOC / liter of ethanol loaded). This VOC emission rate is based on a six hour rolling average. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The maximum number of gasoline hose disconnects performed by the ethanol truck loading operation shall not exceed either of the following limits: 200 disconnects/day or 73,000 disconnects/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The maximum liquid spillage/leaks from each hose disconnect shall not exceed 10 milliliters. [District Rule 2201] Federally Enforceable Through Title V Permit
12. VOC emissions from the denaturated ethanol truck loading operation shall not exceed 3.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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13. Fugitive VOC emissions from equipment leaks associated with the denatured ethanol truck loading operation shall not exceed 3.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Fugitive VOC emissions shall be calculated using the EPA "1995 Protocol for equipment Leak Emissions Estimates" (EPA-453/R-95-017), Table 2-1, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Average Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Ongoing compliance with VOC emission rate from the exhaust vent of the VRU shall be demonstrated at least once per month by sampling the effluent gas stream with an FID, PID, or other District-approved VOC detection device. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Within 6 months of the Title V permit being issued, permittee shall apply for an Authority to Construct (ATC) and fully implement one of the following: 1) modify post-control VOC sampling rate to at least once per day or 2) install a continuous VOC emissions monitor. [40 CFR Part 64] Federally Enforceable Through Title V Permit
17. The permittee shall maintain daily and annual records, in gallons, of the quantity of denatured ethanol processed through the loading rack. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. The permittee shall maintain daily and annual records of the quantity of ethanol hose disconnects at the ethanol truck loading operation. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of the monthly compliance demonstrations taken with a FID, PID, or other District-approved VOC detection device. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. Source testing to demonstrate compliance with the overall VOC emissions rate from the exhaust of the VRU shall be conducted within 60 days after recommencing the operation and at least once every twelve (12) months thereafter, with equipment in operational condition. Source testing shall be conducted while denatured ethanol is being processed through the loading rack. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Source testing to demonstrate compliance with the 99% control efficiency of the VRU shall be conducted within 60 days after recommencing the operation, with equipment in operational condition. Source testing shall be conducted while denatured ethanol is being processed through the loading rack. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Source testing for VOC emissions shall be conducted using EPA Method 18, 25 or 25A. If applicable, source testing shall also be conducted in accordance with EPA's Midwest Scaling Protocol for the Measurement of "VOC Mass Emissions" at Ethanol Production Facilities and/or any other testing methodology that has been previously approved by the District, CARB, and EPA. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
25. During source testing, permittee shall maintain records of the amount of the ethanol loaded, measured in gal-ethanol/hour. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
26. Valves, threaded connections, and flanges shall not leak VOCs in excess of 100 ppmv above background when measured in accordance with EPA Method 21, provided the total number of leaking tagged components of any component type does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
27. Pressure relief valves (PRVs) shall not leak VOC's in excess of 100 ppmv above background when measured in the plane at the centroid of any atmospheric vent with an instrument calibrated with methane, provided the total number of leaking PRVs does not exceed 0.5 percent of the total number of components of that type inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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28. Process drains shall not leak VOC's in excess of 100 ppmv above background when measured at a distance of one (1) centimeter of the potential source with an instrument calibrated with methane, provided the total number of leaking process drains does not exceed 0.5 percent of the total number of components inspected. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
29. Pumps or compressors which handle a VOC or any associated seal fluid system which circulates a fluid through or between seals on process pumps or compressors shall not leak in excess of 500 ppmv above background when measured in accordance with EPA Method 21. [District Rules 2201 and 4455, 5.1.4] Federally Enforceable Through Title V Permit
30. This operation shall comply with the requirements of District Rule 4455, Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants, as specified on facility wide permit N-7365-0. [District Rule 4455] Federally Enforceable Through Title V Permit
31. This operation shall comply with the requirements of 40 CFR 60, Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, as specified on facility wide permit N-7365-0. [40 CFR 60.480 and 60.481] Federally Enforceable Through Title V Permit
32. All records shall be retained on site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
33. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
34. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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